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To Whom it may concern:

enclosed is 15 COPIES plus AN ORIGINAL for MM Docket 99-25 ..

WRITTEN COMMENTS OF JOHN R. BENJAMIN AND CHARLES COPLIEN
also enclosed are

15 COPIES plus AN ORIGINAL

ADDITIONAL COMMENTS OF JOHN R. BENJAMIN AND CHARLES COPLIEN
for MM Docket 99-25

thank you

Respectfully submitted,

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UNITED STATES OF AMERICA
Federal Communications Commission
445 Twelfth Street S.W.
Washington, DC 20554

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In The Matter Of:)	Docket No. MM 99-25
Creation Of A)	Docket No. RM-9208;
Low Power Radio Service)	Docket No. RM-9242

ADDITIONAL COMMENTS OF JOHN R. BENJAMIN AND CHARLES COPLIEN

The two of us, JOHN R. BENJAMIN AND CHARLES COPLIEN, are
United

States citizens. We have an interest in Low Power Broadcasting and would like
to start a community station in Western Pennsylvania, where we reside.

We file these Additional Comments to supplement the Written Comments
we filed on (March 22 1999). We incorporate this earlier filing by reference.

In our basic Written Comments, we noted that John R. Benjamin is the
Communications Director for THE AMHERST ALLIANCE: a nationwide citi-
zens'
group which advocates greater diversity in media ownership AND programming.
We then stressed that we personally agree with the Amherst recommendations
to the FCC on ALMOST every point.

We added that we DISagree with Amherst on THREE important points:

- (1) LP-1000s, and/or LP-250s, should NOT be allowed to "bump" translators;
- (2) LP-100s, as well as LP-10s, should be exempt from EAS requirements; and
- (3) Amateur Radio operators, with a rank of Technician or higher, should be

able to bypass "type acceptance" requirements and build their own equipment.

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TRANSLATORS "YES", SATELLATORS "NO"

With respect to the first point, we wish to revise our recommendation slightly. Following discussions with others, both inside Amherst and outside of it, we continue to believe that TRANSLATORS should not be "bumpable" by LPRS stations. However, we have been persuaded that a distinction should be drawn between translators and SATELLATORS.

Other commenting parties have defined satellators as stations relaying signals over a distance of 400 kilometers (240 miles) or more. We believe this is

a reasonable definition -- AND we believe that signals over such distances, from places with NO cultural or geographical links to their listeners, are an abuse

of the translator station concept. Such SATELLATORS should be "bumpable".

WE ARE NOT ALONE ... ON "TYPE ACCEPTANCE"

With respect to our third point -- a proposal to allow "ham" radio operators to bypass "type acceptance" requirements and build their own equipment -- we noted, in our previous filing, that THE AMHERST ALLIANCE is neutral on the possible easing of requirements for "type acceptance" of equipment.

We have since discovered, however, that the RM-9208 Petitioners (Nick Leggett and Judith Fielder Leggett of Virginia, plus Don Schellhardt of

Connecticut) have proposed "type acceptance" reforms that are similar to our own. Thus, other prominent commenting parties agree with our assessment.

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CONCLUSIONS

For the reasons set forth herein, we AGAIN urge the Commission to proceed with establishment of a Low Power Radio Service at the earliest reasonable time.

We also urge the Commission to adopt the policy recommendations of THE AMHERST ALLIANCE, with these THREE EXCEPTIONS: (1) preventing the "bumping" of translator stations by any LPRS station, including an LP-1000 and/or an LP-250, UNLESS the translator is a SATELLATOR (relaying a signal over 400 kilometers or more); (2) applying the EAS requirements to LP-1000 and/or LP-250 stations ONLY, while exempting LP-10s and LP-100s; and (3) permitting Amateur Radio operators, with a rank of Technician or higher, to bypass "type acceptance" requirements and build their own equipment.

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Respectfully submitted,



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Dated: _____

May 13, 1999